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U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

) I N D I C T M E N T

Plaintiff,

)

v.

)

JONATHAN L. CHAIN,

) CASE NO.

**5 16 CR 071**

Defendant.

)

COUNT 1

**JUDGE POLSTER**

The Grand Jury charges:

On or about October 22, 2015, in the Northern District of Ohio, Eastern Division and elsewhere, the defendant, JONATHAN L. CHAIN, knowingly and willfully transmitted in interstate and foreign commerce from Ohio to Illinois a communication, to wit: a cellular telephone call to a person known to the Grand Jury (hereinafter Victim #1), and the communication contained a threat to injure Victim #1, specifically at approximately 2:15 a.m. on October 22, 2015, JONATHAN L. CHAIN, during the cellular telephone call threatened to sexually assault and otherwise injure Victim #1, in violation of Title 18, United States Code, Section 875(c).

COUNT 2

The Grand Jury further charges:

On or about October 22, 2015, in the Northern District of Ohio, Eastern Division and elsewhere, the defendant, JONATHAN L. CHAIN, knowingly and willfully transmitted in interstate and foreign commerce from Ohio to Illinois a communication, to wit: a cellular telephone call to Victim #1, and the communication contained a threat to injure Victim #1, specifically at approximately 3:50 a.m. on October 22, 2015, JONATHAN L. CHAIN, during the cellular telephone call threatened to sexually assault and otherwise injure Victim #1, in violation of Title 18, United States Code, Section 875(c).

COUNT 3

The Grand Jury further charges:

On or about July 15, 2015, until at least December 2015, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division and elsewhere, JONATHAN L. CHAIN, with intent to harass and intimidate another person, used an electronic communication system of interstate commerce and a facility of interstate commerce, including a cellular telephone and cellular networks, to engage in a course of conduct that caused substantial emotional distress to a person known to the Grand Jury (Victim #1), and placed Victim #1 in reasonable fear of death and serious bodily injury in that from on or about July 15, 2015, until at least in or about December 2015, JONATHAN L. CHAIN made at least 101 cellular telephone calls to Victim #1 and during said phone calls, threatened to sexually assault, rape and kill her and injure and kill her child.

In violation of Title 18, United States Code, Sections 2261A(2)(A) and (B).

COUNT 4

The Grand Jury further charges:

On or about July 12, 2015, in the Northern District of Ohio, Eastern Division and elsewhere, the defendant, JONATHAN L. CHAIN, knowingly and willfully transmitted in interstate and foreign commerce from Michigan and Indiana to Ohio a communication, to wit: a cellular telephone call to a person known to the Grand Jury (hereinafter Victim #2), and the communication contained a threat to injure Victim #2, specifically at approximately 1:53 a.m. on July 12, 2015, JONATHAN L. CHAIN, during the cellular telephone call threatened to sexually assault and otherwise injure Victim #2, in violation of Title 18, United States Code, Section 875(c).

COUNT 5

The Grand Jury further charges:

On or about September 21, 2015, in the Northern District of Ohio, Eastern Division and elsewhere, the defendant, JONATHAN L. CHAIN, knowingly and willfully transmitted in interstate and foreign commerce from Illinois to Ohio a communication, to wit: a cellular telephone call to Victim #2, and the communication contained a threat to injure Victim #2, specifically at approximately 3:12 a.m. on September 21, 2015, JONATHAN L. CHAIN, during the cellular telephone call threatened to sexually assault and otherwise injure Victim #2, in violation of Title 18, United States Code, Section 875(c).

COUNT 6

The Grand Jury further charges:

From in or about July 2015, until at least in or about October 2015, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division and elsewhere, JONATHAN L. CHAIN, with intent to harass and intimidate another person, used an electronic

communication system of interstate commerce and a facility of interstate commerce, including a cellular telephone and cellular networks, to engage in a course of conduct that caused substantial emotional distress to a person known to the Grand Jury (Victim #2), and placed Victim #2 in reasonable fear of death and serious bodily injury in that from in or about July 2015, until at least in or about October 2015, JONATHAN L. CHAIN made at least 55 cellular telephone calls to Victim #2 and during said phone calls, threatened to sexually assault, and rape her.

In violation of Title 18, United States Code, Sections 2261A(2)(A) and (B).

COUNT 7

The Grand Jury further charges:

On or about September 21, 2015, in the Northern District of Ohio, Eastern Division and elsewhere, the defendant, JONATHAN L. CHAIN, knowingly and willfully transmitted in interstate and foreign commerce from Illinois to Ohio a communication, to wit: a cellular telephone call to a person known to the Grand Jury (hereinafter Victim #3), and the communication contained a threat to injure Victim #3, specifically at approximately 2:29 p.m. on September 21, 2015, JONATHAN L. CHAIN, during the cellular telephone call threatened to sexually assault and otherwise injure Victim #3, in violation of Title 18, United States Code, Section 875(c).

COUNT 8

The Grand Jury further charges:

On or about September 22, 2015, in the Northern District of Ohio, Eastern Division and elsewhere, the defendant, JONATHAN L. CHAIN, knowingly and willfully transmitted in interstate and foreign commerce from Illinois to Ohio a communication, to wit: a cellular telephone call to Victim #3, and the communication contained a threat to injure Victim #3, specifically at approximately 2:07 p.m. on September 22, 2015, JONATHAN L. CHAIN, during

the cellular telephone call threatened to sexually assault and otherwise injure Victim #3, in violation of Title 18, United States Code, Section 875(c).

COUNT 9

The Grand Jury further charges:

From in or about September 2015, until at least in or about October 2015, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division and elsewhere, JONATHAN L. CHAIN, with intent to harass and intimidate another person, used an electronic communication system of interstate commerce and a facility of interstate commerce, including a cellular telephone and cellular networks, to engage in a course of conduct that caused substantial emotional distress to a person known to the Grand Jury (Victim #3), and placed Victim #3 in reasonable fear of death and serious bodily injury in that from in or about September 2015, until at least in or about October 2015, JONATHAN L. CHAIN made at least 9 cellular telephone calls to Victim #3 and during said phone calls, threatened to sexually assault.

In violation of Title 18, United States Code, Sections 2261A(2)(A) and (B).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.